

REMARKS

The present application has been reviewed in light of the Office Action dated August 25, 2009. Claims 1, 6-10, 13, and 15-19 are presented for examination, of which Claims 1, 10, and 19 are in independent form. Claims 20-28 have been withdrawn from consideration. Claims 1, 10, and 13-19 have been amended to define aspects of Applicant's invention more clearly. Favorable reconsideration is requested.

The Office Action states that Claims 1 and 6-9 are rejected under 35 U.S.C. § 101, as being directed to non-statutory subject matter. Claim 1 has been amended to include "a computer processor." It is believed that the rejections under Section 101 have been obviated, and their withdrawal therefore is respectfully requested.

The Office Action states that Claims 1, 6-10, 13, and 15-19 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,580,177 (*Gase et al.*) in view of U.S. Patent Application Publication No. 2005/0141008 (*Billow et al.*), and further in view of U.S. Patent No. 7,401,113 (*Appiah et al.*). For at least the following reasons, Applicant submits that independent Claims 1, 10, and 19, together with the claims dependent therefrom, are patentably distinct from the cited prior art.

The aspect of the present invention set forth in Claim 1 is directed to an information processing apparatus that includes a computer processor, a memory unit, an obtaining unit, an updating unit, a recognition unit, a selection unit, and an execution unit. The memory unit is coupled to the computer processor and stores print control modules, including first and second print control modules, for performing processing corresponding to printer functions. Each of the first and second print control modules supports a plurality of types of printers. The memory unit also stores a management table that contains identification

information of the first print control module, version information of the first print control module, and printer type information regarding printers supported by the first print control module.

Notably, the obtaining unit obtains, from the second print control module, version information of the second print control module and printer type information regarding the types of printers supported by the second print control module. If at least one printer type of the printer type information for the second print control module is identical to at least one printer type of the printer type information for the first print control module contained in the management table and, if the version information of the second print control module obtained by the obtaining unit is newer than the version information of the first print control module contained in the management table, the updating unit updates the management table by recording identification information of the second print control module, and the version information and the printer type information in the management table. The updating unit updates the management table without updating the second print control module.

The recognition unit recognizes a printer type of a certain printer. The selection unit selects one of the first and second print control modules in correspondence with the printer type recognized by the recognition unit by referring to the management table updated by the updating unit. The execution unit executes the print control module selected by the selection unit.

By virtue of the operation of the obtaining and updating units, management information for a newest one of multiple versions of a printer driver that supports multiple types

of printers can be managed in the memory unit, and selected by the information processing apparatus, without changing the print driver itself, for example.¹

Gase et al. is understood to relate to printers that are connected to a network and that are accessible from a plurality of client processors via a file server, wherein most recently updated printer driver procedures installed in the client processors are centrally available, and wherein the client processors are continuously informed of a printer's availability status (*see col. 1, lines 7-14*). *Gase et al.* discusses that a file server 16 stores a printer/driver table 36 that associates each printer connected to the file server 16 with a printer driver procedure for the printer, which is used to access printer driver procedures stored in a printer/driver library 38 for a plurality of models of printers (*see col. 3, line 51, to col. 4, line 2*). The file server 16 includes a memory 34 that stores a most updated version 28' of a printer administration utility program 28 and an updated version 24' of a printer utility program 24 (*see col. 4, lines 10-12*). When a client processor elects to utilize a particular printer, the client processor determines whether its printer driver 26 is consistent with the most updated printer driver version in the printer driver library 38 (*see col. 4, lines 17-20*). If not, the client processor causes its printer driver 26 to be overwritten to reflect the most updated printer/driver version contained within the printer driver library 38 (*see col. 4, lines 20-23*).

Gase et al. also discusses that, in response to a printer utility 24 in a client processor requesting a print job from the file server 16, the file server 16 provides the requesting client processor with a list of available printers (*see col. 6, lines 5-8*). Upon selection of a printer, the client processor causes the file server 16, via the printer/driver table 36 and the printer/driver library 38, to compare a printer driver in the library 38 with a printer driver 26

¹ Any examples presented herein are intended for illustrative purposes and are not to be construed to limit the scope of the claims.

contained in the client processor (*see* col. 6, lines 5-12). If the compared printer drivers do not match, an updated printer driver is down-loaded into the client processor from the printer/driver library 38 (*see* col. 6, lines 12-15).

Applicant agrees with the Office Action's conclusion that *Gase et al.* fails to disclose an obtaining unit configured to obtain, from the second print control module, version information of the second print control module and printer type information regarding the plurality of types of printers supported by the second print control module, and updating the management table by recording version information of the first and second print control modules (*see* Office Action, pages 4 and 5). Moreover, nothing has been found in *Gase et al.* that teaches or suggests that identification information, version information, or printer type information of the printer driver 26 is updated in the printer/driver table 36 or the printer/driver library 38, without also updating the printer driver 26.

Appiah et al. is understood to relate to a client-server system in which a proper printer driver for a printer attached to a client can be identified (*see* col. 1, lines 6-8). *Appiah et al.* discusses that a server 52 obtains printer driver information, which identifies a printer driver that is expected to be installed on the server 52 for use with a printer 88 (*see* col. 5, line 65, to col. 6, line 1). An "expected driver" can be determined in various manners (*see* col. 6, lines 1-2). A user of a client 54 may indicate a particular printer driver to use (*see* col. 6, lines 2-7). Alternatively, a Plug-and-Play (PnP) subsystem on the client 54 may indicate that a particular printer driver is to be used, for example, using a PnP identifier that can be resolved by the server 52 into a driver name and version (*see* col. 6, lines 2-7). Typically printer driver information for one printer will identify a single printer driver, although multiple printer drivers, including

multiple names and multiple versions, may be identified in the printer driver information (*see* col. 6, lines 9-13).

As best understood by Applicant, *Appiah et al.* merely discloses that a printer driver may be identified by a version, and that multiple printer drivers may be used with a given printer. Nothing in *Appiah et al.* is understood to teach or suggest that a single printer driver can be used with a plurality of types of printers. Moreover, nothing in *Appiah et al.* is understood to teach or suggest that print driver information of a print driver is updated, without updating the print driver.

Billow et al. is understood to relate to a system for establishing a “proper setup” of a printer and for optimizing color settings for different types of media (*see* paragraph 2). *Billow et al.* discusses that printer media information and printer driver version information can be acquired and identified (*see* paragraph 35). *Billow et al.* also discusses that a printer driver version can be determined by the system when a user examines a list of supported printers and selects a button corresponding to a printer in use (*see* paragraph 35). Similarly, a media type can be determined by the system when the user selects a button corresponding to a medium in use (*see* paragraph 35). The system determines whether the selected printer-media configuration is supported, by referring to an index file 130 (*see* paragraph 35).

As best understood by Applicant, the system maintains information that can be used to map printer driver versions to names of printers available for selection, and that can be used to map media types to names of media available for selection. Nothing in *Billow et al.* is understood to teach or suggest that such information is stored in a print driver, much less that information regarding a plurality of types of printers supported by a print driver is obtained from the print driver. Moreover, nothing has been found in *Billow et al.* that is understood to teach or

suggest that management information of a print driver is updated without also updating the print driver.

In summary, Applicant submits that a combination of *Gase et al.*, *Appiah et al.*, and *Billow et al.*, assuming such combination would even be permissible, would fail to teach or suggest an information processing apparatus that includes “an obtaining unit configured to obtain, from the second print control module, version information of the second print control module and printer type information regarding the plurality of types of printers supported by the second print control module,” and “an updating unit configured to update the management table stored in said memory unit by recording identification information of the second print control module, and the version information and the printer type information obtained by said obtaining unit in the management table, if at least one printer type of the printer type information for the second print control module obtained by said obtaining unit is identical to at least one printer type of the printer type information for the first print control module contained in the management table and if the version information of the second print control module obtained by said obtaining unit is newer than the version information of the first print control module contained in the management table, wherein said updating unit updates the management table without updating the second print control module,” as recited in Claim 1. Accordingly, Applicant submits that Claim 1 is patentable over the cited art, and respectfully requests withdrawal of the rejection of Claim 1 under 35 U.S.C. § 103(a).

Independent Claims 10 and 19 include features sufficiently similar to those of Claim 1 that these claims are believed to be patentable over the cited art for at least the reasons discussed above. The other rejected claims in the present application depend from one or another of independent Claims 1 and 10 and are submitted to be patentable for at least the same

reasons. Because each dependent claim also is deemed to define an additional aspect of the invention, however, individual reconsideration of the patentability of each claim on its own merits is respectfully requested.

In view of the foregoing amendments and remarks, Applicant respectfully requests favorable reconsideration and an early passage to issue of the present application.

Applicant's undersigned attorney may be reached in our New York Office by telephone at (212) 218-2100. All correspondence should be directed to our address listed below.

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